

4. Exhibits C and D are discovery responses exchanged between the Parties, which are designated as “Confidential.” Exhibits R and U are documents produced by the Parties during discovery, which are designated either as “Confidential” or as “Highly Confidential.”

WHEREFORE, Plaintiffs respectfully request leave to file the Exhibits under seal. Plaintiffs will promptly provide complete copies of the Exhibits to Defendants through an encrypted electronic file transfer to allow Defendants to review.

JANE DOE NO. 1, JANE DOE NO. 2,
and JANE DOE NO. 3

Respectfully submitted,

/s/ John T. Montgomery
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Dated: April 11, 2018

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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)
JANE DOE NO. 1, JANE DOE NO. 2, and
)
JANE DOE NO. 3,
)

Plaintiffs,
)

v.
)

Docket No. 1:17-cv-11069-LTS
)

BACKPAGE.COM, LLC, CARL FERRER,
)
MICHAEL LACEY, and JAMES LARKIN,
)

Defendants.
)

[PROPOSED] ORDER

Upon application of Plaintiffs Jane Doe No. 1, Jane Doe No. 2, and Jane Doe No. 3 (“Plaintiffs”), and for good cause shown,

IT IS HEREBY ORDERED this ____ day of _____, 2018, that Plaintiffs may file the exhibits marked as C, D, R, and U (the “Exhibits”) to Plaintiffs’ First Amended Complaint in the above-captioned matter under seal.

IT IS FURTHER ORDERED that Plaintiffs will promptly provide Defendants complete copies of the Exhibits within three (3) days of this Order.

IT IS SO ORDERED.

Dated: _____

HON. LEO T. SOROKIN
U.S. DISTRICT JUDGE
DISTRICT OF MASSACHUSETTS

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of April, 2018, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: April 11, 2018

/s/ John T. Montgomery

John T. Montgomery